

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UAW Local 259 Social Security Department,	:	Civil Action No. 20-cv-12141
Plaintiff,	:	
	:	
v.	:	
	:	
SMG Automotive Holdings, LLC and	:	
Zachary Schwebel,	:	
Defendants.	:	REQUEST FOR ENTRY OF DEFAULT
	:	

To the Clerk of the Court:

Please enter a Default with respect to Defendants SMG Automotive Holdings, LLC and Zachary Schwebel pursuant to FRCP 55(a) for failure to answer or otherwise plead in the above-captioned matter.

Respectfully submitted,

CLEARY, JOSEM & TRIGIANI, LLP

BY: /s/ Jeremy E. Meyer
JOSEPH T. CLEARY, ESQUIRE
JEREMY E. MEYER, ESQUIRE
Constitution Place
325 Chestnut Street, Suite 200
Philadelphia, PA 19106
(215) 735-9099
Attorneys for Plaintiffs

Dated: January 22, 2021

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Request for Entry of Default to be served upon the following by United States First Class Mail on the date indicated below:

SMG Automotive Holdings LLC
d/b/a Brooklyn Chrysler Jeep Dodge Ram
2286 Flatbush Avenue
Brooklyn, NY 11234

Zachary Schwebel
SMG Automotive Holdings LLC
d/b/a Brooklyn Chrysler Jeep Dodge Ram
2286 Flatbush Avenue
Brooklyn, NY 11234

/s/ Jeremy E. Meyer
JEREMY E. MEYER, ESQUIRE

Dated: January 22, 2021